REMARKS

Claim Rejections – 35 U.S.C. 103(a)

In the Office Action of June 16th, 2008, the Examiner stated that the pending claims had been mistakenly written as being rejected under 35 U.S.C. 102(e) in the last Office Action. The applicant assumes a similar mistake has been made in this Office Action and that the 103(a) rejection still stands. The applicant will therefore argue the allowability of pending claims with respect to 35 U.S.C. 103(a).

Response

Claims 1, 10, 18 and 21

As clarified in the previous Office Action response, the fact of the user interface module and the language information being stored in separate devices that are separate from each other leads to a new and unexpected result, namely that the language information module can be updated / modified by a manufacturer without requiring updating of the user interface. As argued before, the motivation for providing two storages requires an inventive step as the result is more than merely extra data storage. The applicant believes there is no motivation for combining the two cited references to lead to independent modification of stored language data by an outside manufacturer.

The Examiner states that Cistulli teaches storage of data in storage devices different than the first storage device. The applicant disagrees. Cistulli, FIG..1 shows that all storage devices (EEPROM, Flash, RAM) are contained in the first storage device 25. Col.2, lines 45 – 55 similarly state that the RAM 75 is contained within the memory 25. Therefore, access of the RAM 75 (for example) will require accessing of the memory 25, and the two devices cannot reasonably be claimed to be devices separate from each other. Furthermore, Cistulli Col.2, lines 27 – 36 teach that BIOS functionalities 35 which include user interface functions 55 are for controlling interactions between the keypad 15, display 30 and memory 25. There is no suggestion given of separately accessing parts of the memory 25 without using the user interface functions 55. Moreover, Cistulli is silent on updating or adding new languages to the memory 25.

The applicant further asserts that a combination of Lee and Cistulli's teachings would not provide a system wherein language updates could take place without accessing the interface module. Lee teaches utilizing the interface (MLCPS) in accordance with a user request (Para [0022] "The mobile communication network 10 connects to the MLCPS 16 through the mobile communication network 12, transmits language package requesting data essentially including a string set version and a font set version, **which is requested by a user of the terminal**, to the MLCPS 16"). As language packages are formed according to user requests, implementing the memory of Cistulli into the system of Lee would have no effect on utilization of the interface module, as utilization of the interface module for language updating is a feature of Lee's system. Therefore, it is incorrect to state that a combination of Lee and Cistulli would form a system wherein a manufacturer can access the language information **without** accessing the interface module. Moreover, this combination does not teach "the interface module is stored in a first storage device of the mobile unit by a manufacturer of the mobile unit, and the language information module and the font database are stored in storage device(s) of the mobile unit being different than the first storage device by the manufacturer of the mobile unit", as argued in the above paragraph.

Furthermore, the applicant disagrees that the limitation of the identification string being an SSC string is anticipated or suggested by the prior arts. The utilization of the SSC string as an ID string has a new and unexpected result. When the ID string is an SSC string, there is no need to update the interface module for recognizing deletion or insertion of a string set and corresponding file set, as all string sets conform to the SSC specifications. In other words, all codes are universal and there is therefore no need for the interface module to **pre-register** which language a stored string set corresponds to as this information can be gained when it accesses the language information module. Lee, however, teaches a method for downloading a string set corresponding to a language (please see Lee, FIG.4) wherein Step 204 "determines whether the language code of the downloaded language package is different from the string set language code stored in the

file storage region of the memory section 30" Para [0037]. If the language code is found to be different, the flow proceeds to Step 206, wherein "the control section 20 registers a language code and a string set pointer corresponding to the language code in a language table in FIG 5A" Para [0038]. Only after this step will the string set and font set be downloaded. Regardless of whether the string set language code is different or not, Step 204 is a necessary step for ensuring a language can be downloaded and then utilized by a user. "When **the string set pointer and the font set pointer corresponding to a language code are registered in the language table and the font table of the memory section 30** and the string set and the font set are stored in the file storage region, a user of the mobile communication terminal can display a desired language on the display section 50 of the mobile communication terminal using the string set and font set that are stored in the memory section 30" Para [0042] *(emphasis added)*. Utilization of SSC strings as ID strings does not require comparing of language codes, as language codes of SSC strings being the same for a same language and unable to be redefined by manufacturers is a feature of SSC strings, and therefore registration of language codes is also a redundant step. It is therefore incorrect to state that Lee teaches utilizing SSC strings as identification strings, as such a limitation would necessitate a different method from that taught by Lee.

For these reasons, the applicant asserts claims 1, 10, 18 and 21 should be found allowable.

Claims 5 – 9 and 24 – 26

Claims 5 – 9 and 24 – 26 are dependent on Claim 1. As the applicant believes Claim 1 has been placed in a position for allowance, claims 5 – 9 and 24 – 26 should also be found allowable.

Claims 14 – 17 and 27

Claims 14 – 17 and 27 are dependent on Claim 10. As the applicant believes Claim 10 has been placed in a position for allowance, claims 14 – 17 and 27 should also be found allowable.

Claims 20 and 28

Claims 20 and 28 are dependent on Claim 18. As the applicant believes Claim 18 has been placed in a position for allowance, claims 20 and 28 should also be found allowable.

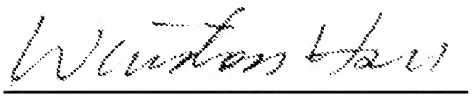
Claims 23 and 29

Claims 23 and 29 are dependent on Claim 21. As the applicant believes Claim 21 has been placed in a position for allowance, claims 23 and 29 should also be found allowable.

Conclusion:

Thus, all pending claims are submitted to be in condition for allowance with respect to the cited art for at least the reasons presented above. The Examiner is encouraged to telephone the undersigned if there are informalities that can be resolved in a phone conversation, or if the Examiner has any ideas or suggestions for further advancing the prosecution of this case.

Sincerely yours,



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Winston Hsu, Patent Agent No. 41,526
P.O. BOX 506, Merrifield, VA 22116, U.S.A.
Voice Mail: 302-729-1562
Facsimile: 806-498-6673
e-mail : winstonhsu@naipo.com

Note: Please leave a message in my voice mail if you need to talk to me. (The time in D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)